

1 Sheri M. Thome
Nevada Bar No. 8657
2 Chad C. Butterfield
Nevada Bar No. 10532
WILSON, ELSE, MOSKOWITZ, EDELMAN & DICKER LLP
3 300 South 4th Street, 11th Floor,
Las Vegas, NV 89101
4 Telephone: 702.727.1400
Facsimile: 702.727.1401
5

6 Michael D. Mandel (admitted *pro hac vice*)
(California SBN #216934)
7 John A. Van Hook SBN (*pro hac vice*)
(California SBN #205067)
MCGUIREWOODS LLP
8 1800 Century Park East
8th Floor
9 Los Angeles, CA 90067-1501
Telephone: 310.315.8200
10 Facsimile: 310.315.8210

11 *Attorneys for Defendant*
BANK OF AMERICA, N.A.

12
13 (*Additional counsel appear on following page*)

14 UNITED STATES DISTRICT COURT
15 DISTRICT OF NEVADA
16

17 MAUREEN CLARK and SONYA
ALEXANDER, individually, and on behalf of
18 all others similarly situated,

19 Plaintiff,

20 vs.

21 BANK OF AMERICA CORPORATION,

22 Defendant.
23
24
25
26
27
28

CASE NO. 2:16-cv-02228

**STIPULATION TO PERMIT
DEFENDANT TO FILE SUR-REPLY IN
FURTHER OPPOSITION TO MOTION
FOR CONDITIONAL CERTIFICATION**

Complaint Filed: September 21, 2016

1 Don Springmeyer
Nevada Bar No. 1021
2 Bradley S. Schrager
Nevada Bar No 10217
Justin C. Jones
3 Nevada Bar No. 8519
WOLF, RIFKIN, SHAPIRO, SCHULMAN & RABKIN, LLP
4 3556 E. Russell Road, Second Floor
Las Vegas, Nevada 89120
5 Telephone: 702.341-5200
Facsimile: 702.341.5300
6 dspringmeyer@wrslawyers.com
bschrager@wrslawyers.com
7 jjones@wrslawyers.com

8 Kevin J. Stoops (admitted *pro hac vice*)
9 (Michigan SBN # P64371)
Jesse L. Young (admitted *pro hac vice*)
10 (Michigan SBN # P72614)
SOMMERS SCHWARTZ, P.C.
11 One Towne Square, 17th Floor
Southfield, Michigan 48076
12 Telephone: 248.236.5752
13 Facsimile: 248.936.2143
kstoops@sommerspc.com
14 jyoung@sommerspc.com

15 Jason T. Brown (admitted *pro hac vice*)
(New Jersey SBN# 035921996)
16 Nicholas Conlon (admitted *pro hac vice*)
(New Jersey SBN# 034052013)
17 JTB LAW GROUP, LLC
18 155 2nd Street, Suite 4
Jersey City, NJ 07302
19 Telephone: 201 630.0000
jtb@jtblawgroup.com
20 nicholasconlon@jtblawgroup.com

21 *Attorneys for Plaintiffs* MAUREEN CLARK and
22 SONYA ALEXANDER
23
24
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

RECITALS

On July 25, 2018, Defendant Bank of America, N.A. (“Defendant”) filed Objections to and Motion to Strike Plaintiffs’ New Evidence and Arguments Improperly Submitted for the First Time in Their Reply in Support of Motion for Conditional Certification, or, in the Alternative, Request for Leave to File a Sur-Reply (Dkt. #59) (the “Objections”).

Subsequently, Defendant and Plaintiffs Maureen Clark and Sonya Alexander (“Plaintiffs”, and collectively with Defendant, the “Parties”) agreed to resolve Defendant’s Objections by agreeing to allow Defendant to file a Sur-Reply in further opposition to Plaintiffs’ Motion for Conditional Certification, to be filed no later than August 2, 2018, and not to exceed three (3) pages.

STIPULATION

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs and Defendant, through their respective undersigned counsel of record, that:

1. Defendant will be permitted to file a Sur-Reply in further opposition to Plaintiffs’ Motion for Conditional Certification, to address the issues identified forth in Defendant’s Objections (Dkt. #59).
2. Defendant shall file its Sur-Reply by August 2, 2018 and it shall not exceed three (3) pages.
3. This Stipulation resolves the objections and requests for relief set forth in Defendant’s Objections.

///
///
///
///

1 IT IS SO STIPULATED.

2 DATED: August 2, 2018

JTB LAW GROUP, LLC

3
4 By: /s/ Nicholas Conlon
Nicholas Conlon, Esq.

5 Attorneys for Plaintiffs
6 MAUREEN CLARK and SONYA
ALEXANDER

7
8 DATED: August 2, 2018

MCGUIREWOODS LLP

9 By: /s John A. Van Hook
10 Michael D. Mandel, Esq.
John A. Van Hook, Esq.

11 Attorneys for Defendant
12 BANK OF AMERICA, N.A.

13
14
15 IT IS SO ORDERED.

16 

17
18 UNITED STATES MAGISTRATE JUDGE

19 DATED: 8-7-2018